

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ELNORA CARTHAN, et al.,

Plaintiffs,

v.

RICK SNYDER, et al.,

Defendants.

Case No. 5:16-cv-10444-JEL-EAS

Hon. Judith E. Levy

Mag. Judge Elizabeth A. Stafford

**STIPULATION REGARDING SCHEDULING ORDER FOR CLASS
ACTION TRIAL**

Defendants, Veolia Water North America Operating Services, LLC, Veolia North America, Inc., and Veolia North America, LLC (the “VNA Defendants”), Leo A. Daly Company; Lockwood Andrews & Newnam, P.C.; and Lockwood Andrews & Newnam, Inc. (the “LAN Defendants”) and Class Plaintiffs hereby stipulate and agree to extend certain pre-trial deadlines in the Scheduling Order for Class Action Trial (ECF No. 2172) as reflected in the attached Exhibit A.

Pursuant to ECF Rule 11(c), the VNA Defendants, LAN Defendants, and Co-Lead Counsel for Plaintiffs request that a text-only order be entered granting this extension of time.

Dated: August 2, 2022

Respectfully submitted,

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Exhibit A

<u>Event</u>	<u>Deadline/ Date Range</u>	<u>REVISED Deadline/Date Range</u>
Completion of any Remaining Merits Discovery	June 10, 2022 to August 26, 2022	August 9, 2022 to October 25, 2022
Plaintiffs' Expert Reports + Complete Disclosures	September 9, 2022	November 8, 2022
Plaintiffs' Expert Depositions (shall be limited to only those experts for whom the parties submit new or additional reports)	September 23, 2022 to October 21, 2022	November 22, 2022 to December 20, 2022
Defendants' Expert Reports + Complete Disclosures	November 23, 2022	January 22, 2023
Plaintiffs' Reply Expert Reports	December 9, 2022	February 7, 2023
Defendants' Reply Expert Reports	December 22, 2022	February 22, 2023
Defendants' Expert Depositions (shall be limited only to those experts for whom the parties submit new or additional reports)	January 9, 2023 to January 31, 2023	March 10, 2023 to April 1, 2023
Reply Expert Report Depositions	January 31, 2023 to February 7, 2023	April 1, 2023 to April 8, 2023
Daubert and Summary Judgment Motions—Opening Briefs	February 24, 2023	April 25, 2023
Daubert and Summary Judgment Response Briefs	March 31, 2023	May 30, 2023
Daubert and Summary Judgment Reply Briefs	April 14, 2023	June 13, 2023
Motions in Limine—Opening Briefs	August 14, 2023	

Deadline for parties to submit joint proposed jury questionnaire to the Court and hearing	TBD	
Deadline for Parties to send 250 copies of Juror Questionnaires to Judge Levy's Chambers in Ann Arbor, Michigan	TBD	
Plaintiffs to Submit to Defendants Draft Joint Pretrial Order (includes witness list and exhibit list)	August 18, 2023	
Jurors Summoned in Court to Answer Questionnaires	TBD	
Hearing Regarding Excusals Based on Jury Questionnaire Responses	TBD	
Motions in Limine Response Briefs	August 28, 2023	
Motions in Limine Reply Briefs	September 6, 2023	
Oral Argument on Daubert Motions	TBD	
Defendants to Submit to Plaintiffs Draft Joint Pretrial Order (includes witness list and exhibit list) and engage in meet and confer	September 1, 2023	
Oral Argument on Summary Judgment Motions	TBD	
Oral Argument on Motions in Limine	TBD	
Deposition Designations (due for exchange between parties)	TBD	

Parties to submit Voir Dire Questions, Proposed Preliminary Jury Instructions	September 11, 2023	
Parties to submit Joint Final Pretrial Order	September 15, 2023	
Objections to Deposition Designations and Counter-Designations (due for exchange between parties)	TBD	
Deadline for Submitting Deposition Designations Matrices and Highlighted Transcripts to the Court	TBD	
Deadline for Court to Inform Jury Department of Excusals Based on Questionnaires	TBD	
Final Pretrial Conference, hearing on motions in limine	September 25, 2023 10:30 am	
Hearing Regarding Misc. Pretrial Matters (if needed)	October 2, 2023 10:30 am	
First Day of Trial/Voir Dire	October 3, 2023	